

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION

In re:	)	
	)	
PATRICK JOSEPH CORRIGAN,	)	CHAPTER 7
	)	CASE NO. 15-15059-FJB
Debtor	)	

**CERTIFICATE OF SERVICE**

I, Ryan M. MacDonald, hereby certify that on the 21<sup>st</sup> day of March, 2016, I served a copy of the *Notice of Intended Private Sale of Property, Solicitation of Counteroffers, Deadline for Submitting Objections and Higher Offers and Hearing Date* and copy of the *Notice of Noneventary Hearing* via first-class mail, postage prepaid or by electronic mail upon the parties listed on the attached Service List.

/s/ Ryan M. MacDonald  
Ryan M. MacDonald, Esq. BBO #654688  
Murtha Cullina LLP  
99 High Street  
Boston, MA 02110  
617-457-4000 Telephone  
617-482-3868 Facsimile  
rmacdonald@murthalaw.com

John Fitzgerald, Asst. U.S. Trustee\*  
Office of the US Trustee  
J.W. McCormack P.O. & Courthouse  
5 Post Office Sq., 10th Fl, Suite 1000  
Boston, MA 02109

Patrick Joseph Corrigan  
12 Haven Street  
Dover, MA 02030

Justin Kesselman, Esq.\*  
Laura Otenti, Esq.\*  
David J. Reier, Esq.\*  
Posternak Blankstein & Lund LLP  
Prudential Tower  
800 Boylston Street  
Boston, MA 02199

Michael F. Dowley, Esq.\*  
William J. Hanlon, Esq.\*  
Seyfarth Shaw LLP  
Two Seaport Lane, Suite 300  
Boston, MA 02210

Richard E. Mikels, Esq.\*  
Mintz, Levin, Cohn, Ferris, Glovsky and  
Popeo  
One Financial Center  
Boston, MA 02111

Michael H. Theodore, Esq.\*  
Cohn and Dussi, LLC  
500 West Cummings Park, Suite 2350  
Woburn, MA 01801

1627 Sherborn, LLC  
12 Haven Street  
Dover, MA 02030

284 North Street, LLC  
284 North Street  
Medfield, MA 02052

ACC Loan Management  
Charlemont Place  
Dublin 2, IRELAND

Aengus Burns  
Grant Thornton  
Mayoralty House  
Flood Street  
Galway, IRELAND

AIB Bank  
Bankcentre  
Ballsbridge  
Dublin 4, IRELAND

Bank of America  
P.O. Box 982238  
El Paso, TX 79998

Bank of Canton  
490 Turnpike Street  
Canton, MA 02021

Bank of Ireland  
40 Mespil Road  
Dublin 4, IRELAND

Bank of Scotland  
Chapel House  
21-26 Parnell Street  
Dublin 1, IRELAND

Blue Cross Blue Shield of  
Massachusetts  
101 Huntington Avenue  
Law Department Mailstop 01 18  
Boston, MA 02199

Bridgewater Credit Union  
75 Main Street  
P.O. Box 610  
Bridgewater, MA 02324

Capita Asset Services (Ireland) Limited  
Capital House  
3 Upper Queen Street  
Belfast, BT1 6FB, IRELAND

CD Development Limited  
Lacala Truskee East  
Village of Barna  
County of Galway  
IRELAND

Chris Crehan  
c/o Knocknacarra Investments Limited  
2 Cluian Mhor Clybaun Road  
County of Galway  
Galway, IRELAND

Cordil Construction Limited  
Lacala Truskee East  
Village of Barna  
County of Galway  
IRELAND

Corrigan & Dillon Partnership  
Lacala Truskee East  
Village of Barna  
County of Galway  
IRELAND

Damian Crehan  
c/o Knocknacarra Investments Limited  
2 Cluain Mhor Clybaun Road  
County of Galway  
Galway, IRELAND

Dedham Savings Bank  
55 Elm Street  
Dedham, MA 02026

Dillon Eustace  
33 Sir John Rogerson's Quay  
Dublin 2, IRELAND

Dun Eibhir Management Limited  
Lacala Truskee East  
Village of Barna  
County of Galway  
IRELAND

First Boston Associates LLC  
859 Willard Street  
Quincy, MA 02169

Five Conrick Lane LLC  
12 Haven Street  
Dover, MA 02030

Galligan Johnston Solicitors  
15 Clanwilliam Terrace  
Dublin 2, IRELAND

Gerry Dillon  
Lacala Truskee East  
Village of Barna  
County of Galway  
IRELAND

Haven Terrace LLC  
12 Haven Street  
Dover, MA 02030

Hibernian Aviva General Insurance Ltd  
One Park Place  
Hatch Street  
Dublin 2, IRELAND

Karina Corrigan  
12 Haven Street  
Dover, MA 02030

KBC Bank  
Sandwith Street  
Dublin 2, IRELAND

Knocknacarra Investments Limited  
2 Cluain Mhor Clybaun Road  
County of Galway  
Galway, IRELAND

Michael McAteer  
Grant Thornton  
24-26 City Quay  
Dublin 2, IRELAND

Michael Thomas Durkan and Patrick  
Durkan  
Bridge Street  
Louisburg, Westport  
County of Mayo  
IRELAND

Michelle Kozin  
25 Haven Street  
Dover, MA 02030

Munich Re Capital Limited  
St. Helen's 1 Undershaft  
London, EC3A 8EE, ENGLAND

Needham Savings Bank  
1063 Great Plain Avenue  
Needham, MA 02492

Office of the Revenue Commissioners  
Dublin Castle  
Dublin 2, IRELAND

Promontoria (Arrow) Limited  
1 Grant's Row  
Mount Street Lower  
Dublin 2, IRELAND

Rose, Chinitz & Rose  
Attn: Alan Rose  
One Beacon Street, 23rd Floor  
Boston, MA 02108

Round Tuit Enterprises  
Attn: Gary D. Pelletier  
100 Spring Street  
Millis, MA 02054

Savilles  
33 Molesworth Street  
Dublin 2, IRELAND

Sheila Corrigan  
284 North Street  
Medfield, MA 02052

Societe Generale  
IFSC House, Third Floor  
IFSC  
Dublin 1, IRELAND

Start Mortgages Limited  
Trimleston House, Beech Hill Campus  
Clonskeagh  
Dublin 4, IRELAND

The Cloutier Law Firm  
1990 Centre Street  
Attn: Kevin M. Cloutier  
West Roxbury, MA 02132

Ulster Bank  
Group Centre  
George's Quay  
Dublin 2, IRELAND

Ulster Bank Ireland Limited  
First Floor  
63 Ranelagh  
Dublin 6, IRELAND

Uri Dahan  
859 Willard Street, Suite 400  
Quincy, MA 02170

William M. Hill, Esq.  
Mintz Levin Cohn Ferris Glovsky &  
Popeo  
1 Financial Center  
Boston, MA 02111

Winters Property Management Co.  
Liosban Business Park, Unit 5A  
Tuam Road  
Galway City, IRELAND

**\*served by electronic transmission**

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION**

In re

Chapter 7

PATRICK JOSEPH CORRIGAN,

Case No. 15-15059-FJB

Debtor.

**NOTICE OF INTENDED PRIVATE SALE OF PROPERTY,  
SOLICITATION OF COUNTEROFFERS,  
DEADLINE FOR SUBMITTING OBJECTIONS AND HIGHER OFFERS  
AND HEARING DATE**

4-6-2016 at 9:15 A.M. IS THE DATE OF THE HEARING ON THE PROPOSED SALE

April 4, 2016 by 4:30 P.M. IS THE DATE BY WHICH OBJECTIONS OR COUNTEROFFERS MUST BE MADE

**NOTICE IS HEREBY GIVEN**, pursuant to 11 U.S.C. Section 363, Fed. R. Bankr. P. 2002(a)(2) and 6004, and MLBR 2002-5 and 6004-1, that the Trustee intends to sell at private sale the Debtors' right, title and interest in the following described property of these bankruptcy estates.

**PROPERTY TO BE SOLD:**

The bankruptcy estates' interest in real property known and described as 25 Haven Street, Dover, Massachusetts (the "Property").

**THE OFFER:**

The Trustee has entered into a Purchase and Sale Agreement, under which the Trustee intends to sell the Property to the proposed buyer identified below for the sum of TWO HUNDRED THOUSAND DOLLARS (\$200,000.00) (the "Purchase and Sale Agreement"). A copy of the Purchase and Sale Agreement is attached hereto as Exhibit A.

**THE PROPOSED BUYER:**

The proposed buyer is My New Home, LLC, (the "Proposed Buyer"). There is no relationship between the Proposed Buyer and the Trustee.

**THE SALE DATE:**

The closing shall take place as soon practicable after the Bankruptcy Court's allowance of the Trustee's Motion for Authority to Sell By Private Sale Certain Real Property of the Debtor Free and Clear of All Liens, Claims and Encumbrances (the "Sale Motion") but no later than April 22, 2016. The Proposed Buyer has paid a deposit to the Trustee in the amount of THIRTY THOUSAND DOLLARS (\$30,000.00). The terms of the proposed sale are more particularly described in the Sale Motion filed with the Court on March 18, 2016, and the Purchase and Sale Agreement dated March 18, 2016, which is attached hereto as Exhibit A. The Sale Motion and the Purchase and Sale Agreement are available at no charge upon request from the undersigned.

**SALE OF PROPERTY SUBJECT TO LIENS:**

The Property will be sold subject to all liens, claims, encumbrances or other interests except that the sale will be free and clear of the Writ of Attachment dated May 18, 2015 in the amount of \$3,250,000 in favor of Michael Thomas Durkan and Patrick Durkan (collectively, the "Durkans") recorded against the Property in the Norfolk Registry of Deeds in Book 33136, Page 542 and any other lien of record in favor of the Durkans.

**"AS IS" AND "WHERE IS":**

The Property is being sold "AS IS" AND "WHERE IS" without any representations or warranties.

**COUNTEROFFERS OR OBJECTIONS:**

Any objections to the sale and/or higher offers must be filed in writing with the Clerk of Court, United States Bankruptcy Court for the District of Massachusetts, John W. McCormack Post Office and Courthouse, 5 Post Office Square, Suite 1150, Boston, Massachusetts 02109, on or before 4-4-2016 at 4:30 P.M. A copy of any objection and/or higher offer also shall be served upon the undersigned. Any objection to the sale must state with particularity the grounds for the objection and why the intended sale should not be authorized. Any objection to the sale shall be governed by Fed. R. Bankr. P. 9014.

**Through this Notice, higher offers for the Property are hereby solicited. Any higher offer must be accompanied by a DEPOSIT IN THE AMOUNT OF THIRTY THOUSAND DOLLARS (\$30,000.00) in the form of a certified or bank check made payable to "Mark G. DeGiacomo, Chapter 7 Trustee." Higher offers must be in the amount of at least \$210,000.00 and must be on the same terms and conditions provided in the Purchase and Sale Agreement, other than the purchase price.**

**HEARING:**

A hearing on the Sale Motion, objections or higher offers is scheduled to take place on April 6, 2016 at 9:15 am before the Honorable Frank J. Bailey, United States Bankruptcy Judge, at the United States Bankruptcy Court, John W. McCormack Post Office and Courthouse, 5 Post Office Square, 12th Floor, Boston, Massachusetts, in Courtroom 3. Any party that has filed an objection or higher offer is expected to be present at the hearing, failing which the objection may be overruled or the higher offer stricken. The Court may take evidence at any hearing on approval of the sale to resolve issues of fact. If no objection to the Sale Motion or higher offer is timely filed, the Court, in its discretion, may cancel the scheduled hearing and approve the sale without hearing.

At the hearing on the sale the Court may (1) consider any requests to strike a higher offer, (2) determine further terms and conditions of the sale, (3) determine the requirements for further competitive bidding, and (4) require one or more rounds of sealed or open bids from the original offeror and any other qualifying offeror.

**DEPOSIT:**

The deposit will be forfeited to the estate if the successful purchaser fails to complete the sale as soon practicable after the Bankruptcy Court's allowance of the Sale Motion but no later than April 22, 2016. If the sale is not completed by the buyer approved by the Bankruptcy Court, the Trustee, without further hearing, may sell the Property to the next highest bidder.

Any questions concerning the intended sale shall be addressed to the undersigned.

Respectfully submitted,

MARK G. DEGIACOMO, CHAPTER 7 TRUSTEE OF  
THE ESTATE OF PATRICK JOSEPH CORRIGAN,

By his attorneys,

/s/ Ryan M. MacDonald

Mark G. DeGiacomo, Esq. BBO #118170

Ryan M. MacDonald, Esq. BBO #654688

Murtha Cullina LLP

99 High Street

Boston, MA 02110

617-457-4000 Telephone

617-482-3868 Facsimile

[mdegiacomo@murthalaw.com](mailto:mdegiacomo@murthalaw.com)

[rmacdonald@murthalaw.com](mailto:rmacdonald@murthalaw.com)

Dated: March 18, 2016

In Re: Patrick Joseph Corrigan  
Debtor,

Chapter: 7  
Case No: 15-15059  
Judge Frank J. Bailey

### NOTICE OF NONEVIDENTIARY HEARING

**PLEASE TAKE NOTICE** that a **HEARING** will be held on **4/6/16 at 09:15 A.M** before the Honorable Judge Frank J. Bailey, Courtroom 3, J.W. McCormack Post Office & Court House, 5 Post Office Square, 12th Floor, Boston, MA 02109-3945 to consider the following:

[51] Motion filed by Trustee Mark G. DeGiacomo For Order Granting the Trustee Authority to Authorize the Sale of Certain Real Property Owned by Haven Terrace LLC (4 Haven Terrace, Dover, Massachusetts)

[52] Motion filed by Trustee Mark G. DeGiacomo For Order Granting the Trustee Authority to Authorize the Sale of Certain of Certain Real Property Owned by Haven Terrace LLC (Certain Lots, Dover, Massachusetts).

### OBJECTION/RESPONSE DEADLINE: APRIL 4, 2016 12:00 Noon

If no deadline is set, the objection/response deadline shall be governed by the Federal Rules of Bankruptcy Procedure (FRBP) and the Massachusetts Local Bankruptcy Rules (MLBR). If no objection/response is timely filed, the Court, in its discretion, may cancel the hearing and rule on the motion without a hearing or further notice. See MLBR 9013-1(f).

### THE MOVING PARTY IS RESPONSIBLE FOR:

1. Serving a copy of this notice upon all parties entitled to notice forthwith; and
2. Filing a certificate of service with respect to this notice seven (7) days after the date of issuance set forth below. If the hearing date is less than seven (7) days from the date of issuance, the certificate of service must be filed no later than the time of the hearing. **If the movant fails to timely file a certificate of service, the court may deny the motion without a hearing.**

### NOTICE TO ALL PARTIES SERVED:

1. **Your rights may be affected.** You should read this notice, the above referenced pleading and any related documents carefully and discuss them with your attorney, if you have one. If you do not have an attorney, you may wish to consult one.
2. Any request for a continuance **MUST** be made by **WRITTEN MOTION** filed and served at least one (1) business day prior to the hearing date. See MLBR 5071-1.
3. The above hearing shall be **nonevidentiary**. If, in the course of the nonevidentiary hearing, the court determines the existence of a disputed and material issue of fact, the court will schedule an evidentiary hearing. **If this is a hearing under section 362,** it will be a consolidated preliminary and final nonevidentiary hearing unless at the conclusion thereof the court schedules an evidentiary hearing.

Date: 3/18/16

By the Court,

Mary Murray  
Deputy Clerk  
617-748-5350

**Emergency Closings:** To find out if the Court will be closed in case of stormy weather or other emergency, dial (617) 748-5314 or (866) 419-5695 (toll free) for a recorded message.